

Yellow

JUL 11 2002

D-8J

Paul F. Durkin, Director  
Health and Safety  
Cookson Electronics  
225 Foxborough Blvd., Suite 150  
Foxborough, Massachusetts 02035

RE: Approval of PCB Cleanup - Stage 1  
Enthone Inc., Warren, Michigan

Dear Mr. Durkin:

The United States Environmental Protection Agency (U.S. EPA) is granting an approval to Enthone Inc. (Enthone) of Warren, Michigan, to complete the Stage 1 activities of the PCB cleanup of the site as described in the request submitted by Connestoga-Rovers & Associates (CRA) on June 24, 2002, on behalf of Enthone.

This approval applies only to Stage 1 activities of the PCB cleanup listed below. The removal of the accessible PCB contaminated soil, and leaving in place soil with more than 50 ppm PCBs under reinforced concrete and PCBs present in clay, will be addressed in a risk based approval which will be issued after Michigan Department of Environmental Quality (MDEQ) and U.S. EPA have completed their evaluations of the risk. Stage 1 activities include the following as presented in the PCB Cleanup Work Plan submitted as part of the risk based application for the PCB Cleanup:

- 1) Preparing and implementing the health and safety-plan (Section 2.1).
- 2) Procuring contractors (Section 2.2).
- 3) Conducting pre-mobilization and mobilization activities (Sections 2.3 and 2.4).
- 4) Constructing and using the decontamination pad (Sections 2.5 and 2.15).
- 5) Removing the duct work and selected piping in the New Low Bay (Sections 2.5 and 2.10).

6) Removing and disposing of concrete floor slab in the New Low Bay with a PCB concentration greater than or equal to 50 ppm (Section 2.6 and 2.10). The work will be conducted while utilizing Level C personal protective equipment (PPE). Air monitoring for total volatile organics will be conducted during the concrete removal activities. The soil exposed following the removal of the concrete floor will be covered with polyethylene sheeting.

7) Grouting and capping the process sewer system, including pumping, treating and disposing of the water currently contained in the sewer system (Sections 2.10 and 2.13).

Enthone must make sure that the health and safety-plan addresses the possible presence of any volatile organic chemicals (VOCs) in the New Low Bay area. The U.S. EPA reminds Enthone that remediation waste with less than 50 ppm of PCBs must be stored separately from waste having 50 ppm or more of PCBs prior to disposal in order to prevent dilution. Disposal of the remediation waste must be in accordance with 40 CFR Section 761.61(a)(5)(i)(B). Water generated during the removal must be treated and disposed of according to 40 CFR Section 761.79(b).

This authorization does not relieve Enthone of the responsibility to comply with all other Federal, State and local regulations and ordinances for the removal activities on site.

Please call Priscilla Fonseca, of my staff, at (312) 886-1334, if you have any questions related to this matter.

Sincerely,

Robert Springer, Director  
Waste Pesticides and Toxics Division

cc. Kimberly Tyson (MDEQ)  
Amy Merricle (MDEQ)  
James Reed, (CRA)  
Mark Jacobs (Dykema Gossett)  
Jim Tolbert (Earthtech)

6) Removing and disposing of concrete floor slab in the New Low Bay with a PCB concentration greater than or equal to 50 ppm (Section 2.6 and 2.10). The work will be initiated in Level C personal protective equipment (PPE). Air monitoring for total volatile organics will be conducted during the concrete removal activities. The soil exposed following the concrete floor will be covered with polyethylene sheeting.

7) Grouting and capping the process sewer system, including pumping, treating and disposing of the water currently contained in the sewer system (Sections 2.10 and 2.13).

Enthone must make sure that the health and safety-plan addresses the possible presence of any volatile organic chemicals (VOCs) in the New Low Bay area. The U.S. EPA reminds Enthone that <50 ppm and ≥50 ppm remediation waste must be stored separately prior to disposal. Water generated during the removal must be treated and disposed according to 40 CFR Section 761.79(b). Disposal of the remediation waste must be in accordance with 40 CFR Section 761.61 (a)(5)(i)(B).

This authorization does not relieve Enthone of the responsibility to comply with all other Federal, State and local regulations and ordinances for the removal activities on site.

Please call Priscilla Fonseca, of my staff, at (312) 886-1334, if you have any questions related to this matter.

Sincerely,

ORIGINAL SIGNED BY  
PHYLLIS REED

Robert Springer, Director  
Waste Pesticides and Toxics Division

cc. Kimberly Tyson (MDEQ)  
Amy Merricle(MDEQ)  
James Reed, (CRA)  
Mark Jacobs (Dykema Gossett)  
Jim Tolbert (Earthtech)

Fonseca per 6/27/02  
Martig in 6/27/02  
Connell 40 7/1/02  
Restaino 7-9-02  
Springer 7/19/02

Corrections made  
7/1/02, 7/19/02



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

July 09, 2002

MEMORANDUM

Subject: Approval of PCB Cleanup- Stage 1 for Enthone, Inc., Warren, Michigan

From: Priscilla Fonseca *Priscilla*  
Toxic Program Section

To: Robert Springer, Director  
Waste Pesticide and Toxics Division

On February 18, 2002, Enthone, Inc. submitted a risk based application for PCB cleanup of their site in Warren, Michigan. Enthone found PCB contamination in three specific areas of the facility when they were conducting decommissioning activities for future sale of the facility. Connestoga Rovers and Associates (CRA) conducted further site characterization to determine the extent of the PCB contamination. Since Enthone is subject to RCRA corrective action, information on the PCB contamination was shared with MDEQ for review. MDEQ and U.S. EPA are still reviewing the risk assessment submitted in support of their risk based disposal application. Both agencies visited the site and have agreed to work together in the restriction language of the approval as soon as all information is received from Enthone.

A prospective buyer, who is currently leasing some area of the facility, wants to see that Enthone starts the PCB cleanup at the site. Enthone requested that they be allowed to perform Stage 1 of the PCB Cleanup to show their prospective buyer that they are addressing the PCB contamination at the site. The Toxic Program Section and MDEQ have discussed this request and both agreed to allow them to perform Stage 1. The activities to be conducted under Stage 1 are spelled out in the attached letter. Item # 7 requires an approval under the PCB regulations.

Attachment.